

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 1:21-cr-00180

vs.

GOVERNMENT'S INITIAL PRETRIAL
CONFERENCE SUMMARY STATEMENT

GEOFFREY MARK TALSMAN,

Defendant. /

I. DISCOVERY

A. Statements of Defendant

1. Oral Statements [Rule 16(a)(1)(A)]

- ☐ There are no written records of oral statements or other oral statements as defined in Rule 16(a)(1)(A).
- ☒ There are the following written records of oral statements: **statements to Postal Service representative on November 30, 2017 (FBI-001847; USPIS-000018); Voluntary Interview with FBI on 3/8/21 (FBI-002533); Voluntary Interview with FBI on 3/5/21 (FBI-002535);**

the substance of which

- ☐ has been disclosed to defense counsel
- ☒ will be disclosed to defense counsel by **at initial pretrial conference.**

2. Written or Recorded Statements [Rule 16(a)(1)(B)]

- ☒ There are no written or recorded statements or grand jury testimony of defendant.
- ☐ There are the following written or recorded statements or grand jury testimony:

All written or recorded statements

- ☐ have been disclosed to defense counsel
- ☐ will be disclosed to defense counsel by

B. Defendant's Prior Record [Rule 16(a)(1)(D)]

- ☐ The government has made due inquiry and is not aware of any prior criminal record.
- ☒ The government has disclosed defendant's prior criminal history. **Disclosed at IPTC.**
- ☐ The government is now making inquiry into defendant's prior criminal history. The results will be disclosed to defense counsel upon receipt.

C. Documents and Tangible Objects [Rule 16(a)(1)(E)]

- ☐ The government has no documents, tangible objects, or physical evidence required to be disclosed.
- ☒ The government has the following documents, tangible objects, and physical evidence:
- ☐ Controlled Substances:
 - ☐ Drug Paraphernalia:
 - ☒ Records: **Amazon records; Postal Service and private carrier shipping records; bank records; internet service provider records; cellular telephone records; textbook vendor records; rental vehicle records; debit and credit card transaction records.**
 - ☐ Drug Records:
 - ☐ Firearms:
 - ☐ Inventory (attached)
 - ☒ Other: **audio recordings of Amazon concession calls; surveillance videos; pictures from surveillance; textbooks; MyVanilla visa cards and other debit or credit devices; cellular telephones recovered in search; Amazon shipping boxes recovered from prior residences of Talsma.**

- ☐ The government voluntarily notifies the defendant of the following search warrants issued and the warrant returns:
- ☐ State
 - ☒ Federal (list case number and caption) **All from United States District Court, W.D. Michigan**

In the Matter of the Tracking of White Colored 2008 Porsche Cayenne Station Wagon, 1:18-MJ-220;

In the Matter of the Search of 1130 E. Osterhout Avenue; 1:21-MJ-114

In the Matter of the Search of Dark-Colored 2020 Dodge Caravan, 1:21-MJ-115;

In the Matter of the Search of 2012 Mercedes Benz Station Wagon, 1:21-MC-116;

In the Matter of the Search of TextNow account coronaschmona, 1:21-mj-221

- ☒ They have been made available for inspection and copying by defense counsel.
Produced at IPTC.
- ☐ Defense counsel should make arrangements with

D. Reports of Examinations and Tests [Rule 16(a)(1)(F)]

- ☐ The government has no reports of examinations or tests required to be disclosed by Rule 16.
- ☒ The government has or expects to have reports of the following examinations and tests:
- ☐ Drug Analysis ☐ Handwriting ☐ Fingerprints
 - ☐ DNA ☐ Firearms/Nexus ☐ Gun Operability
 - ☒ Computer Forensics **of cell phones and other devices** ☐ Other

E. Reciprocal Discovery

- ☒ The government seeks reciprocal discovery.

F. Notice Under FRE 404(b)

- ☐ The government does not presently intend to introduce 404(b) evidence.
- ☒ The government does presently intend to introduce the following 404(b) evidence:
Records Talsma produced claiming return of books to Amazon;
Signature on False Verification of Employment for Defendant Larson;
False attestation of employment on loan applications to United Bay Community Credit Union;
- ☐ The government will provide pretrial notice of 404(b) evidence by **IPTC**.

G. Other Discovery Matters:

II. TRIAL

- A. The government requests a ☒ jury ☐ non-jury trial.
- B. Length of trial excluding jury selection is estimated at 4-5 days

III. MISCELLANEOUS

The parties acknowledge that if the case is appropriate for expedited resolution, a joint motion for expedited sentencing shall be filed within 14 days of arraignment.

- ☒ The government is unaware at this time of any known conflict with defendant's representation by counsel. The United States will immediately advise counsel if any such conflict becomes known.
- ☐ The government is aware of the following potential conflict(s):
- ☒ Government's plea negotiation policy: No concessions within 2 weeks of Final Pretrial Conference

Date: October 25, 2021

Ronald M. Stella
Assistant United States Attorney